

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

03 Civ 7045 (HB)

BRIGHTPOINT, INC.,
AMERICAN INTERNATIONAL GROUP, INC.,
PHILLIP BOUNSALL,
JOHN DELANEY, AND
TIMOTHY HARCHARIK,

Defendants,

- - - - - X

Electronically Filed
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying
Government's Memorandum of Law in Support of Motion to Intervene
and to Stay Discovery, the United States will move this Court on
April 28, 2005 or as soon thereafter as the parties may be heard,
before the Honorable Harold Baer, Jr., at the United States
Courthouse at 500 Pearl Street, New York, New York, pursuant to
Rule 24 of the Federal Rules of Civil Procedure, for intervention
for the limited purpose of seeking a stay of discovery and for
such other relief as the Court deems appropriate.

Dated: April 12, 2005

Respectfully submitted,
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By: s/
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